

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

October 5, 2007

Shelly Moskwa, Treasurer Hillary Clinton for President PO Box 101436 Arlington, VA 22210

Response Due Date: November 5, 2007

Identification Number: C00431569

Reference:

Amended April Quarterly Report (1/1/07 - 3/31/07), received 8/3/07

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following item:

- Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,300 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §§ 441a(a) and (f); 11 CFR §§ 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

<u>For reattributions</u>, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly

reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made.

Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §§ 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1160.

Sincerely,

Camilla Reminsky

Senior Campaign Finance Analyst

Reports Analysis Division

CON	ITRIBUTOR NAME	DATE	AMOUNT	ELECTION
Alhusseini	Ibrahim	2/22/2007	\$6,900.00	P2008
Alhusseini	Ibrahim	2/22/2007	\$2,300.00	G2008
Apteker	James	3/31/2007	\$2,300.00	P2008
Apte <u>ke</u> r	James	3/31/2007	\$2,300.00	G2008
Apteker	James	5/23/2007	(\$2,300.00)	P2008
Apteker	James	5/23/2007	(\$2,300.00)	P2008
Apteker	Jim	3/31/2007	\$4,600.00	G2008
Bach	Jonathan	2/21/2007	\$1,150.00	P2008
Bach	Jonathan	3/14/2007	\$2,300.00	P2008
Boggs	Timothy	2/22/2007	\$250.00	P2008_
Boggs	Timothy	3/28/2007	\$2,300.00	G2008
Boggs	Timothy	3/28/2007	\$2,300.00	P2008
Capes	David	2/12/2007	\$2,300.00	P2008
Capes	David V	3/20/2007	\$2,300.00	P2008
Cloobeck	Stephen J	3/29/2007	\$6,900.00	P2008
Cloobeck	Stephen J	3/29/2007	\$2,300.00	G2008
Cohen	Susan	1/26/2007	\$2,300.00	P2008
Cohen	Susan	3/30/2007	\$2,300.00	G2008
Cohen	Susan	3/30/2007	\$2,300.00	P2008
Crane	David	2/20/2007	\$2,300.00	P2008
Сгапе	David	3/31/2007	\$2,300.00	P2008
Crane	David	3/31/2007	\$2,300.00	G2008
Creel	Deborah	3/28/2007	\$2,300.00	G2008
Creel	Deborah	3/28/2007	\$6,900.00	P2008
Fried	Lycia N	3/30/2007	\$2,300.00	G2008
Fried	Lycia N	3/30/2007	\$2,300.00	P2008
Fried	Lycia N	3/31/2007	\$4,600.00	P2008
Fried	Richard B	3/30/2007	\$2,300.00	G2008
Fried	Richard B	3/30/2007	\$2,300.00	P2008
Fried	Richard B	3/31/2007	\$4,600.00	P2008
Goldmeier	Barry S	3/28/2007	\$2,300.00	G2008
Goldmeier	Barry S	3/28/2007	\$4,600.00	P2008
Goldmeier	Barry S	3/28/2007	\$2,300.00	P2008

CON	TRIBUTOR NAME	DATE	AMOUNT	ELECTION
Heyward	Andy	3/28/2007	\$4,600.00	P2008
Heyward	Andy	3/28/2007	\$2,300.00	G2008
Heyward	Andy	3/28/2007	\$2,300.00	P2008
Holladay	Wilhelmina	2/20/2007	\$2,300.00	G2008
Holladay	Withelmina	2/20/2007	\$2,300.00	P2008
Holladay	Withelmina Cole	2/5/2007	\$1,000.00	P2008
Iscol	Jill	1/26/2007	\$1,900.00	G2008
Iscol	Jill	1/26/2007	\$2,300.00	P2008
Iscol	Jill	3/28/2007	\$400.00	P2008
Кагр	Joel	3/30/2007	\$2,000.00	P2008
Karp	Joel J	2/28/2007	\$1,000.00	P2008
Kim	Won H	2/23/2007	\$2,300.00	G2008
Kim	Won H	2/23/2007	\$2,300.00	P2008
Kìm	Won H	3/28/2007	\$2,000.00	P2008
Kirtland	f W	2/28/2007	\$400.00	P2008
Kirtland	Fred	1/23/2007	\$1,900.00	G2008
Kirtland	Fred	1/23/2007	\$2,300.00	P2008
Lee	S Zachary	1/30/2007	\$2,100.00	P2008
Lee	S Zachary	3/26/2007	\$200.00	G2008
Lee	S Zachary	3/26/2007	\$2,300.00	P2008
Leichtman	Lauren B	3/14/2007	\$2,300.00	P2008
Leichtman	Lauren B	3/14/2007	\$2,300.00	G2008
Leichtman	Lauren B	3/14/2007	\$2,300.00	P2008
Liu	David	3/16/2007	\$350.00	P2008
Lîu	David	3/20/2007	\$2,000.00	P2008
Maloney	Pat Jr	3/28/2007	\$2,300.00	G2008
Maloney	Pat Jr	1/23/2007	\$2,100.00	P2008
Maloney	Pat Jr	3/28/2007	\$4,800.00	P2008
Maughan	Lady Va	2/6/2007	\$2,300.00	G2008
Maughan	Lady Va	2/6/2007	\$2,300.00	P2008
Maughan	Lady Va	3/31/2007	\$9,200.00	P2008
Maughan	Lady Va	5/25/2007	(\$4,600.00)	P2008
Migdol	Aaron	2/13/2007	\$250.00	P2008
Migdol	Aaron	3/22/2007	\$2,300.00	P2008

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Mocres	John	3/30/2007	\$2,300.00	G2008
Moores	John	3/30/2007	\$2,300.00	P2008
Moores	John J	3/31/2007	\$2,300.00	G2008
Moores	John J	3/31/2007	\$2,300.00	P2008
Morales	Robert	1/22/2007	\$1,500.00	P2008
Morales	Robert	3/29/2007	\$2,300.00	P2008
Morales	Robert	3/31/2007	\$500.00	P2008
Oehl	Ronald J	2/7/2007	\$2,300.00	P2008
Oehl	Ronald J	3/6/2007	\$2,300.00	P2008
Ozgur	Lynne E	2/14/2007	\$2,300.00	P2008
Ozgur	Lynne E	3/8/2007	\$400.00	P2008
Paimer	Doug	2/5/2007	\$250.00	P2008
Palmer	Douglas	3/31/2007	\$2,300.00	G2008
Palmer	Douglas	3/31/2007	\$2,300.00	P2008
Phillips	Diane	1/23/2007	\$200.00	P2008
Phillips	Diane	3/28/2007	\$2,300.00	G2008
Phillips	Diane	3/28/2007	\$2,300.00	P2008
Prashad	Rishi	2/9/2007	\$500.00	P2008
Prashad	Rishi	3/26/2007	\$200.00	P2008
Prashad	Rishi	3/26/2007	\$1,800.00	P2008
Rosenbaum	Joseph I	3/31/2007	\$2,300.00	G2008
Rosenbaum_	Joseph I	3/31/2007	\$4,600.00	P2008
Rosenbaum	Joseph I	3/31/2007	\$2,300.00	P2008
Rubin	Howard A	1/26/2007	\$1,900.00	G2008
Rubin	Howard A	1/26/2007	\$2,300.00	P2008
Rubin	Howard A	3/14/2007	\$2,300.00	P2008
Rubin	Howard A	3/22/2007	\$400.00	G2008
Sax	Neal	3/31/2007	\$2,300.00	P2008
Sax	Neal	3/31/2007	\$2,300.00	G2008
Sax	Neal	3/31/2007	\$2,300.00	P2008
Schwartz	Ayse Aysoy	3/9/2007	\$250.00	P2008
Schwartz	Aysegul Aysoy	3/31/2007	\$2,300.00	P2008

CON	ITRIBUTOR NAME	DATE	AMOUNT	ELECTION
Shafer	Jeffrey	3/31/2007	\$2,300.00	G2008
Shafer	Jeffrey	3/31/2007	\$2,300.00	G2008
Shafer	Jeffrey	3/31/2007	\$2,300.00	P2008
Shafer	Jeffrey	3/31/2007	\$2,300.00	P2008
Shafer	Jeffrey	4/27/2007	(\$4,600.00)	P2008
Shaye	Robert	3/14/2007	\$2,300.00	G2008
Shaye	Robert	3/14/2007	\$2,300.00	P2008
Shaye	Robert	3/29/2007	\$2,300.00	P2008
Sheflott	Loy	3/26/2007	\$2,300.00	G2008
Sheflott	Loy	3/26/2007	\$2,300.00	P2008
Sheflott	Loy E	3/20/2007	\$1,000.00	P2008
Sinha	Jaya	3/31/2007	\$2,300.00	P2008
Sinha	Jaya	3/31/2007	\$2,700.00	P2008
Sternberg	Sy	1/26/2007	\$1,900.00	G2008
Sternberg	Sy	1/26/2007	\$2,300.00	P2008
Sternberg	SY	3/31/2007	\$800.00	P2008
Stewart	Damley D	3/19/2007	\$2,300.00	P2008
Stewart	Damtey D	3/22/2007	\$2,300.00	P2008
Sullivan	Virginia M	3/31/2007	\$2,300.00	G2008
Sullivan	Virginia M	3/7/2007	\$2,000.00	P2008
Sullivan	Virginia M	3/31/2007	\$1,300.00	P2008
Thompson	John	2/23/2007	\$2,300.00	P2008
Thompson	John David	3/6/2007	\$500.00	P2008
Thoyer	Judith	- 2/5/2007	\$1,000.00	P2008
Thoyer	Judith	3/28/2007	\$500.00	P2008
Thoyer	Judith R	3/14/2007	\$1,000.00	P2008
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Laura Chick Committee		2/21/2007	\$2,300.00	G2008
Laura Chick Committee		2/21/2007	\$2,300.00	P2008
Laura Chick Committee		4/24/2007	(\$2,300.00)	P2008
Laura Chick Committee		4/24/2007	(\$1,300.00)	P2008
Michael McNulty for Congress		3/26/2007	\$2,300.00	G2008
Michael McNulty for Congress		3/26/2007	\$2,300.00	P2008
Michael McNulty for Congress		4/2/2007	(\$600.00)	P2008

